

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**ROSE AMOUGOU NGASSAM**

**Plaintiff,**

**v.**

**MICHAEL CHERTOFF,  
Secretary of Department of Homeland  
Security; EMILIO GONZALEZ,  
Director of United States Citizenship &  
Immigration Services, F. GERARD  
HEINAUER, Director of the Nebraska  
Service Center of United States  
Citizenship & Immigration Services**

**Defendants.**

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**Case No: 07 Civ. 8172 (LLS)**

**NOTICE OF MOTION FOR  
RECONSIDERATION/REARGUMENT**

**PLEASE TAKE NOTICE** that on the \_\_\_\_\_ day of October 2007, at \_\_\_\_\_ a.m. or as soon thereafter as counsel may be heard, attorneys for Plaintiff, shall move, before the Honorable Louis L. Stanton, U.S.D.J., United States Courthouse, Room 21C, 500 Pearl Street, New York, New York, 10007, for the entry of an Order in the form submitted herewith, granting reconsideration of the Court's September 19, 2007 sua sponte dismissal of Plaintiff's complaint for lack of subject matter jurisdiction and denial of Plaintiff's Order to Show Cause for Preliminary Injunction, and reinstating Plaintiff's Complaint and Order to Show Cause.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiff shall rely upon this Notice of Motion and a Memorandum of Law in Support of Plaintiff's Motion to Reconsider.

**PLEASE TAKE FURTHER NOTICE** that counsel for Plaintiffs hereby requests oral argument.

Respectfully Submitted,

/s/

**SETON HALL UNIVERSITY SCHOOL OF LAW  
CENTER FOR SOCIAL JUSTICE**

Attorney for Plaintiff

By: Bryan Lonegan Esq.

Jenny-Brooke Condon, Esq.

Jisun Chang, Student Intern

Gal Davidovitch, Student Intern